

## **REMARKS**

Applicants respectfully traverse and request reconsideration.

Claims 65-67 stand rejected under 35 U.S.C. §112, 2nd paragraph, as allegedly being indefinite. Applicants have amended the claims to correct typographical error.

Claims 2, 4-6, 8, 9, 12, 13, 41, 44-46, 48, 54, 56, 58, 60, 63 and 65 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. patent No. 6,630,727 (Tutsch et al.) in view of U.S. Patent No. 5,475,264 (Sudo et al.). This is a new ground of rejection. The Tutsch reference is directed to a modularly expandable multilayered semiconductor component that includes a carrier layer and at least one intermediate layer and at least one cover layer. The intermediate layers are provided with at least one opening, into which at least one semiconductor chip is inserted.

As to claim 56, the office action alleges that Tutsch teaches, among other things, “wherein the planar top surface of the encapsulated structure in the top surface of the package semiconductor die are of equal distance from the substrate (see FIG. 2)” (page 3 of office action). However, Applicants respectfully submit that Tutsch does not teach such structure. For example, claim 56 requires, among other things, that an unpackaged semiconductor die is encapsulated onto a package module in a structure having a planar top surface and a separately packaged semiconductor die has a top surface and is also attached to the package module. The claim further requires that the planar top surface of the capsulated structure and the top surface of the packaged semiconductor die are of equal distance from the substrate. However, the Tutsch reference teaches a different structure. Tutsch shows, in FIG. 2, that the top surface of the packaged die is well below the top surface of the encapsulated structure that encapsulates the unpackaged semiconductor die. As shown, the packaged semiconductor die is covered with molding compound 12 which is required to be placed on the top of the packaged semiconductor

die. In contrast, Applicants claim a different approach in which a planar top surface of the encapsulated structure of the unpackaged die and the top surface of the packaged semiconductor die are of equal distance from the substrate. (See Applicants' Specification, FIG. 6 and elsewhere, showing and describing for example, package dies 120, 130 having their top portions an equal distance from a substrate compared to the top of the planar portion of a encapsulated unpackaged die). Accordingly, since the reference does not teach what is alleged, the claims are in condition for allowance.

The dependent claims add additional novel and non-obvious subject matter. In addition, they are also allowable at least as depending from allowable base claims.

Claims 47, 59, 61, 66 and 67 also stand rejected under 35 U.S.C. §103(a) as being unpatentable over Tutsch et al. in view of Sudo et al. and further in view of Lu et al. Applicants respectfully reassert the relevant remarks made above with respect to the Tutsch reference and as such, these claims are also in condition for allowance as the Tutsch reference does not teach what is alleged in the office action.

Claims 3, 7, 17, 18, 20, 24, 25, 53, 57 and 64 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Tutsch et al. in view of Sudo et al. and further in view of Hannah '232. As to the independent claims, Applicants again respectfully reassert the relevant remarks made above with respect to the Tutsch reference since Tutsch does not teach what is alleged in the office action but teaches a different structure. Accordingly, the claims are in condition for allowance.

The dependent claims add additional novel and non-obvious subject matter.

Claim 11 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Tutsch et al. in view of Sudo et al. as applied to claim 56 and further in view of Takano et al. '907.

Applicants respectfully reassert the relevant remarks made above with respect to claim 56 and as such, this claim is also believed to be in condition for allowance.

Claim 23 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Tutsch et al., Sudo et al. and Hannah as applied to claim 57 and further in view of Takano et al. Applicants respectfully reassert the relevant remarks made above with respect to claim 57 and as such, this claim is also believed to be in condition for allowance.

Applicants respectfully submit that the claims are in condition for allowance, and an early Notice of Allowance is earnestly solicited. The Examiner is invited to telephone the below-listed attorney if the Examiner believes that a telephone conference will expedite the prosecution of the application.

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Respectfully submitted,

  
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